

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION**

WAYLON BAILEY,

Plaintiff,

v.

RANDELL ILES, in his individual capacity; and
SHERIFF MARK WOOD, in his official
capacity as a public entity;

Defendants.

CIVIL ACTION NO. 1:20-cv-01211

JUDGE DAVID C. JOSEPH

MAG. JUDGE PEREZ-MONTES

PROPOSED JURY VERDICT FORM

Now comes plaintiff, Waylon, and Defendants, Randell Iles, in his individual capacity, and Sheriff Mark Wood, in his official capacity as a public entity, who jointly provided their respective Jury Verdict Forms.

[PLAINTIFF'S PROPOSED] JURY VERDICT FORM

NOTE: *You must complete this form in its entirety before concluding your deliberations and notifying the Court.*

Question No. 1

What amount of money will reasonably and fairly compensate Mr. Bailey for the damages that he suffered by the Defendants' acts or failure to act?

COMPENSATORY DAMAGES: \$ _____

(Regardless of your answer, please proceed to Interrogatory No. 2)

Question No. 2(a)

Has Mr. Bailey proven by a preponderance of evidence that Defendant Iles acted with malice or with reckless indifference to the rights of Mr. Bailey?

YES

NO

(If You answered YES, please proceed to Interrogatory No. 2(b). If you answered NO, and if you awarded compensatory damages, please proceed to sign the Verdict Form. If you did not award compensatory damages, please proceed to Interrogatory No. 3)

Question No. 2(b)

What amount of money is an appropriate amount of punitive damages to punish and deter Defendant Iles for his malice or reckless inference to the rights of Mr. Bailey?

PUNITIVE DAMAGES: \$ _____

Question No. 3

What amount of money is a reasonable amount of nominal damages for the Defendants' invasion of Mr. Bailey's civil rights?

NOMINAL DAMAGES: \$ _____

**PLEASE HAVE THE FOREPERSON SIGN AND DATE THIS FORM AND
NOTIFY THE BAILIFF.**

Alexandria, Louisiana, this _____ day of _____, 2024.

FOREPERSON

[DEFENDANTS' PROPOSED] JURY VERDICT FORM

1. Did Waylon Bailey prove by preponderance of the evidence that he was falsely arrested by Randell Iles acting in violation of Waylon Bailey's constitutional rights?

Yes ____ No ____

If your answer to Question No. 1 is no, please proceed to the end of the Jury Verdict Form and sign and date it. If your answer is yes to Question No. 1, proceed to Question No. 2.

2. Did Waylon Bailey prove by a preponderance of the evidence that qualified immunity does not apply in this case?

Yes ____ No ____

If your answer to Question No. 2 is no, please proceed to the end of the Jury Verdict Form and sign and date it. If your answer to Question No. 2 is yes, proceed to Question No. 3.

3. Was the false arrest the cause of any injuries to Waylon Bailey?

Yes ____ No ____

If your answer to Question No. 3 is no, please proceed to the end of the Jury Verdict Form and sign and date it. If your answer is yes to Question No. 3, please proceed to Question No.

4.

4. What amount do you award Waylon Bailey in nominal damages against Randell Iles?

\$ _____

If you awarded nominal damages, proceed to Question No. 6. If you did not award nominal damages, proceed to Question No. 5.

5. What amount do you award Waylon Bailey in compensatory damages for the injuries that he suffered in this incident?

\$ _____

Please proceed to Question No. 6.

6. Do you believe that Waylon Bailey has proven by a preponderance of the evidence that Randell Iles' acted with evil intent, malice or with reckless indifference to the rights of Waylon Bailey?

Yes ____ No ____

If your answer to Question No. 6 is no, please proceed to the end of the Jury Verdict Form and sign and date it. If your answer to Question No. 6 is yes, please indicate the amount of punitive damages that should be awarded against Randell Iles to punish and deter him.

\$ _____

DATE:

FOREPERSON:

Once the Jury Verdict Form is signed and dated, please present it to the Courtroom Deputy.

Respectfully Submitted:

PROVOSTY, SADLER & deLAUNAY, APC

By: /s/ H. Bradford Calvit
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ATTORNEYS FOR DEFENDANTS,
RANDELL ILES and SHERIFF MARK WOOD,
IN HIS OFFICIAL CAPACITY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of December, 2023, I electronically filed the foregoing DEFENDANTS' PROPOSED VERDICT FORM with the Clerk of Court by using the CM/ECF system which will send notice of electronic filing to the following:

Garret Scott DeReus
Bizer & DeReus
3319 St Claude Ave
New Orleans, LA 70117
P: 504-619-9999 F: 504-948-9996
Email: gdereus@bizerlaw.com

I further certify that I have forwarded the foregoing document via facsimile and/or first-class mail to the following non-CM/ECF participants: NONE

/s/ H. Bradford Calvit